

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

MUJAANI INSANUN

Plaintiff(s), *IN PROPRIA*
PERSONA SUI JURIS
vs.

ROBERT J. SEMRAD ET AL.
LAW OFFICES OF ROBERT J. SEMRAD
SEMRAD AND ASSOCIATES LLC

JAMES A. TORRES
DEBT STOPPERS

Defendant(s).

16CV9647
JUDGE ALONSO
MAG. JUDGE WEISMAN

RECEIVED

OCT 11 2016

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

COMPLAINT FOR VIOLATION OF CONSTITUTIONAL RIGHTS

This form complaint is designed to help you, as a pro se plaintiff, state your case in a clear manner. Please read the directions and the numbered paragraphs carefully. Some paragraphs may not apply to you. You may cross out paragraphs that do not apply to you. All references to "plaintiff" and "defendant" are stated in the singular but will apply to more than one plaintiff or defendant if that is the nature of the case.

1. This is a claim for violation of plaintiff's civil rights as protected by the Constitution and laws of the United States under 42 U.S.C. §§ 1983, 1985, and 1986.
2. The court has jurisdiction under 28 U.S.C. §§ 1343 and 1367.
3. Plaintiff's full name is MUJAANI INSANUN.

If there are additional plaintiffs, fill in the above information as to the first-named plaintiff and complete the information for each additional plaintiff on an extra sheet.

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4. Defendant, ROBERT J. SEMRAD, is
(name, badge number if known)

☐ an officer or official employed by _____;
(department or agency of government)

_____ or
☒ an individual not employed by a governmental entity.

If there are additional defendants, fill in the above information as to the first-named defendant and complete the information for each additional defendant on an extra sheet.

5. The municipality, township or county under whose authority defendant officer or official acted is CHICAGO, IL.. As to plaintiff's federal constitutional claims, the municipality, township or county is a defendant only if custom or policy allegations are made at paragraph 7 below.

6. On or about JAN 2015, at approximately 5 P.M. ☐ a.m. ☒ p.m.
(month, day, year)

plaintiff was present in the municipality (or unincorporated area) of CHICAGO
IL., in the County of COOK

State of Illinois, at 11101 SOUTH WESTERN AVE. CHICAGO,
(identify location as precisely as possible)

IL 60643
when defendant violated plaintiff's civil rights as follows (Place X in each box that applies):

- ☐ arrested or seized plaintiff without probable cause to believe that plaintiff had committed, was committing or was about to commit a crime;
- ☐ searched plaintiff or his property without a warrant and without reasonable cause;
- ☐ used excessive force upon plaintiff;
- ☐ failed to intervene to protect plaintiff from violation of plaintiff's civil rights by one or more other defendants;
- ☐ failed to provide plaintiff with needed medical care;
- ☐ conspired together to violate one or more of plaintiff's civil rights;

☒ Other:

THE RICO DEFENDANTS HAVE UNLAWFULLY, KNOWINGLY AND
WILLFULLY COMBINED, CONSPIRED, CONFEDERATED, AGREED
TOGETHER AND WITH OTHERS TO VIOLATE 18 U.S.C. 1962
(C), 18 U.S.C. 1962(d)

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7. Defendant officer or official acted pursuant to a custom or policy of defendant municipality, county or township, which custom or policy is the following: (*Leave blank*

if no custom or policy is alleged): SEMRAD ETAL HAVE IMPLEMENTED AND CONTINUED TO ENFORCE AN ONGOING CRIMINAL ENTERPRISE NAMELY THROUGH A MULTI-FACETED CAMPAIGN OF LIES, FRAUD AND OFFICIAL CORRUPTION.

8. Plaintiff was charged with one or more crimes, specifically:

N/A

9. (*Place an X in the box that applies. If none applies, you may describe the criminal proceedings under "Other"*) The criminal proceedings

- ☐ are still pending. N/A
- ☐ were terminated in favor of plaintiff in a manner indicating plaintiff was innocent.¹ N/A
- ☐ Plaintiff was found guilty of one or more charges because defendant deprived me of a fair trial as follows N/A

☐ Other: _____

¹Examples of termination in favor of the plaintiff in a manner indicating plaintiff was innocent may include a judgment of not guilty, reversal of a conviction on direct appeal, expungement of the conviction, a voluntary dismissal (SOL) by the prosecutor, or a *nolle prosequi* order.

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10. Plaintiff further alleges as follows: *(Describe what happened that you believe supports your claims. To the extent possible, be specific as to your own actions and the actions of each defendant.)*

SEE COMPLAINT Pg. 6-16

11. Defendant acted knowingly, intentionally, willfully and maliciously.
12. As a result of defendant's conduct, plaintiff was injured as follows:

SEE COMPLAINT Pg. 7

13. Plaintiff asks that the case be tried by a jury. ☒ Yes ☐ No

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

14. Plaintiff also claims violation of rights that may be protected by the laws of Illinois, such as false arrest, assault, battery, false imprisonment, malicious prosecution, conspiracy, and/or any other claim that may be supported by the allegations of this complaint.

WHEREFORE, plaintiff asks for the following relief:

- A. Damages to compensate for all bodily harm, emotional harm, pain and suffering, loss of income, loss of enjoyment of life, property damage and any other injuries inflicted by defendant;
- B. ☒ (Place X in box if you are seeking punitive damages.) Punitive damages against the individual defendant; and
- C. Such injunctive, declaratory, or other relief as may be appropriate, including attorney's fees and reasonable expenses as authorized by 42 U.S.C. § 1988.

Plaintiff's signature: _____

Plaintiff's name (print clearly or type):

MUSAANI INSANUV N

Plaintiff's mailing address:

3542 W. FLOURNOY ST (BASEMENT)

City

CHICAGO

State

IL

ZIP

60624

Plaintiff's telephone number:

(773)-726-1660

Plaintiff's email address (if you prefer to be contacted by email): _____

15. Plaintiff has previously filed a case in this district. ☐ Yes ☒ No

If yes, please list the cases below.

Any additional plaintiffs must sign the complaint and provide the same information as the first plaintiff. An additional signature page may be added.